

# MEMO ENDORSED



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The request is denied. The Clerk of Court is respectfully directed to terminate the motion. Doc. 14.

So ordered.

Edgardo Ramos, U.S.D.J

Dated: 8/23/2021

New York, New York

August 20, 2021

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
The Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *RainMarkers Partners, LLC v. NewSpring Capital LLC et al*  
(21-CV-6800)

Dear Judge Ramos,

We are counsel for plaintiff RainMakers Partners, LLC, and we write to request that until the parties can agree to and put in place a Protective Order concerning the treatment of “confidential” documents, information, and other materials that the Court order that all letters, motions, declarations, memoranda, and all other papers be filed under seal. We are concerned that opposing counsel may (perhaps even inadvertently) reveal information that we consider to be confidential or proprietary.

Opposing counsel, Paul Leary, does not share our concern and he will not consent to our request.

According to the Court’s most briefing schedule, dated August 13, opposition papers are due on Monday, August 23 before 9 am; and reply papers are due on Tuesday, August 24 before 9 am, with a preliminary hearing scheduled at 3:30 pm.

We thank the Court for its attention to this matter and welcome the opportunity to address any concerns or questions that the Court may have regarding this matter.

Very truly yours,

/s/ Reeves Carter